

1 **SCHEPER KIM & HARRIS LLP**
2 DAVID C. SCHEPER (State Bar No. 120174)
3 Email: dscheper@scheperkim.com
4 JEAN M. NELSON (State Bar No. 150856)
5 Email: jnelson@scheperkim.com
6 GREGORY A. ELLIS (State Bar No. 204478)
7 Email: gellis@scheperkim.com
8 ALEXANDER H. COTE (State Bar No. 211558)
9 Email: acote@scheperkim.com
10 601 West Fifth Street, 12th Floor
11 Los Angeles, CA 90071-2025
12 Telephone: (213) 613-4655
13 Facsimile: (213) 613-4656

**9 Attorneys for Plaintiff
10 CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

15 CELLCO PARTNERSHIP d/b/a
16 VERIZON WIRELESS.

17 Plaintiff,

18 | V.

19 TORO RIDE, INC.; KAREN KEVIN
GALSTIAN and DOES 1-10, Inclusive.

Defendants.

CASE NO. 2:15-CV-1187-DSF (PLAx)

**STIPULATION TO DISMISS FIRST
AMENDED COMPLAINT**

Action Filed: 02/18/15
Trial Date: None Set

1 Plaintiff Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) and
2 Defendants Toro Ride, Inc. and Karen Kevin Galstian (collectively “Defendants”),
3 stipulate as follows:

4 1. On March 16, 2015, the Court issued a preliminary injunction in favor
5 of Verizon Wireless in this matter. (Docket No 53.)

6 2. On April 3, 2015, the parties filed a stipulation with the Court, noting
7 that, among other things, Defendants intended to file a motion requesting that the
8 Court stay the instant action while the related criminal case against Defendant
9 Galstian is pending. (Docket No. 72.)

10 3. On April 7, 2015, the Court entered an order staying the case through
11 October 19, 2015, with the exception that Plaintiff Cellco Partnership d/b/a Verizon
12 Wireless could continue to conduct discovery and take other steps to identify and
13 attach Defendant Toro Ride, Inc.’s assets. (Docket No. 73.)

14 4. On December 17, 2015, the Court issued a second order staying the
15 case through January 18, 2016. (Docket No. 107.) Thereafter, the Court issued two
16 more orders staying the case through March 28, 2016, while the criminal case
17 against Defendant Galstian remained pending in the Southern District of California,
18 Case No. 3:15-cr-2509-BTM-1.

19 5. On March 21, 2016, Defendant Galstian was sentenced to 100 months
20 in prison and ordered to pay over \$17 million in restitution to Verizon Wireless.

21 6. Now that Defendant Galstian has been sentenced, the parties stipulate
22 that the Court should dismiss the pending First Amended Complaint as to all
23 defendants without prejudice.

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2 7. A proposed order is submitted concurrently with this stipulation.

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4 DATED: April 7, 2016

Respectfully submitted,

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SCHEPER KIM & HARRIS LLP
DAVID C. SCHEPER
JEAN M. NELSON
GREGORY A. ELLIS
ALEXANDER H. COTE

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By: /s/ Jean M. Nelson

Jean M. Nelson
Attorneys for Plaintiff
CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS

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SIGNATURE ATTESTATION

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I hereby attest that all of the signatories electronically listed above concur in this filing's content and have authorized the filing in compliance with Local Rule 5-4.3.4.(a)(2)(i).

By: /s/ Jean M. Nelson
Jean M. Nelson

1 **CERTIFICATE OF SERVICE**
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3 I hereby certify that on April 7, 2016, I caused the foregoing to be
4 electronically filed with the Clerk of Court using the CM/ECF System, which will
5 send notification of the filing to all counsel of record.

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8 /s/ Jean M. Nelson
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